

# EXHIBIT 3



November 15, 2013

Russell M. Yankwitt  
Yankwitt LLP  
140 Grand Street  
White Plains, NY 10601  
russell@yankwitt.com

James M. Sabovich  
3161 Michelson Drive  
Irvine, CA 926512  
JSabovich@gibsondunn.com

VIA ELECTRONIC MAIL

Dear Counsel,

EarthRights International (ERI) has learned that Chevron, pursuant to its subpoena on Donald Moncayo, is seeking documents pertaining to Amazon Watch (AW) and the Rainforest Action Network (RAN) and their work on matters relating to the Lago Agrio litigation, including possible attorney work product and First Amendment protected communications. We represent AW and RAN in this matter.

Because such documents may include protected work product and First Amendment protected materials, we seek your agreement that we will have the opportunity to review any responsive documents relating to AW and RAN, and that documents identified as privileged by AW and RAN will not be produced, as follows:

1. With respect to AW, a compilation of any and all documents that contain the search terms Amazon /2 Watch; AW; Han /3 Shan; Paz /3 Mino; Leila /3 Salazar; Soltani; Kevin; Mitch\*; 415-487-9600; 415-342-4783; 510-773-4635; 202-256-9795 or 310-456-1340 shall be furnished to ERI in the same format as it would be produced, prior to production.
2. With respect to RAN, a compilation of any and all documents that contain the search terms "RAN" and "Rainforest Action Network" shall be furnished to ERI in the same format as it would be produced, prior to production. ERI, on behalf of AW and RAN, shall have 24 hours to review these documents prior to production. If the responsive

U.S. Office  
1612 K Street NW, Suite 401  
Washington, DC 20006  
Tel: (202) 466-5188  
Fax: (202) 466-5189  
email: infousa@earthrights.org

Southeast Asia Office  
P.O. Box 123  
Chiang Mai University  
Chiang Mai 50202 Thailand  
Tel/Fax: 66 1 531 1256  
email: infoasia@earthrights.org

- documents for this subset of search terms comprise greater than 500 pages, at least an additional 24 hours will be provided for review.
3. If this requires any change in the time period for production, that is a matter to be worked out between Chevron and Mr. Moncayo.
  4. ERI shall have the opportunity to submit privilege logs on behalf of AW and RAN to counsel for Mr. Moncayo and counsel for Chevron prior to production.
  5. Any documents identified as privileged by ERI shall not be produced by Mr. Moncayo at this time.

Please inform me of your position by the end of the day today. If necessary, we will seek relief from the Court.

Sincerely,

/s/ Richard Herz  
Richard Herz  
EarthRights International  
1612 K Street, NW Suite 401  
Washington, DC 20006  
(202) 466-5188 ext. 114  
rick@earthrights.org